Marcus Leinart State Bar No. 00794156 Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§
CARLOS DEJUAN BAKER	§ CASE NO. 24-44095-MXM-13
GAY AVERY BAKER	§
Debtors	§
	§ CHAPTER 13
OFFICE OF THE STANDING	
CHAPTER 13 TRUSTEE	§
Movant	§
	§
vs.	§
	§
CARLOS DEJUAN BAKER	§
GAY AVERY BAKER	§
Debtors	§

OPPOSED RESPONSE TO TRUSTEE'S 14 DAY NOTICE OF INTENT TO CERTIFY CHAPTER 13 CASE FOR DISMISSAL PER GENERAL ORDER 2017-01

TO THE HONORABLE COURT AND INTERESTED PARTIES:□

Debtors herein object to the Trustee's 14 Day Notice of Intent to Certify Chapter 13 Case for Dismissal per General Order 2017-01 dated February 4, 2025.

Debtors request that the Chapter 13 Plan payment arrears be cured by being allowed until March 20, 2025 to be current without risk of Dismissal during the interim.

DATED: February 19, 2025

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart

Marcus Leinart State Bar No. 00794156 ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on a true and correct copy of the foregoing Opposed Response to "Trustee's 14 Day Notice of Intent to Certify Chapter 13 Case for Dismissal per General Order 2017-01," was served on the date the instrument was filed electronically. Service was accomplished electronically on the Trustee and all parties who filed a notice of appearance consenting to electronic service.

DATED: February 19, 2025

Respectfully Submitted,

Leinart Law Firm 10670 N. Central Exprwy, Ste 320 Dallas, TX 75231 469.232.3328 Phone 214.221.1755 Fax

By: /s/ Marcus Leinart

Marcus Leinart State Bar No. 00794156 ATTORNEY FOR DEBTORS